

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR. 13-CR20827-1

HON. MARIANNE BATTANI

Plaintiff,

vs.

LARRY O'NEIL WALKER II

Defendant.

_____ /

MOTION TO TERMINATE SUPERVISED RELEASE

Now Comes Larry O'Neil Walker II by and through his attorney,
Steven Scharg and moves this Court to terminate his supervised release
saying to the Court as follows:

1. On March 31, 2014 Defendant was convicted of violation of 18
USC Section 111(a)(1) and 111(b).

2. The government's position at sentencing was that the advisory
guidelines range was 92-115 months and Defendant should be
sentenced to 108 months. On July 22, 2014 it was determined that the
advisory guideline range was 63 to 78 months. Defendant was
sentenced to the custody of the Bureau of Prisons for 78 months and a
supervised release term of three years.

3. Larry O'Neil Walker was released from custody on July 12, 2019.

4. Mr. Walker promptly obtained gainful employment at Premiere Supportive Services in 2019 where he worked until finding better paying employment with DPHC Services, LLC (ID# 802543867, Newport, Michigan) which provides home care services including grocery shopping, meal preparation, housework and errand assistance. Undersigned has written communication confirming employment since October 5, 2020 as a maintenance attendant who has demonstrated a good work ethic, dedication and attitude. He is an exemplary employee.

5. Mr. Walker is well on the road to being a productive responsible citizen who wants to serve as a supportive role model for his children. He adamantly rejects the idea of becoming involved in criminal or unacceptable behavior. He has not intent on putting himself in any position which could cause a reappearance in the criminal justice system. Undersigned conferred with United States Probation Officer, Danielle Imprada who said Mr. Walker has had no violations, no incidents, and "has been in full compliance".

6. Well more than a year of supervised release has expired and this Court enjoys the discretion to terminate supervised release at this

time pursuant to 18 USC Section 3583(e).

WHEREFORE, Larry O'Neil Walker II respectfully moves this Honorable Court for an order terminating supervised release.

Respectfully submitted,

/s/Steven Scharg
STEVEN SCHARG P43732
Attorney for Defendant Walker
615 Griswold, Suite 1120
Detroit, Michigan 48226
(313) 300-0214
Scharg1924@gmail.com

Dated: February 16, 2021

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR. 13-CR20827-1

HON. MARIANNE BATTANI

Plaintiff,

vs.

LARRY O'NEIL WALKER II

Defendant.

_____ /

MEMORANDUM IN SUPPORT OF MOTION

Title 18 USC Section 3583(e) provides for modification of conditions of supervised release. The statute allows for the termination of supervised release and discharge at any time after expiration of one year.

This Court has the discretion and latitude to consider a broad range of factors See United States v Spinelle, 41 F3d 1056 (6th Cir 1994); United States v Pregent, 190 F3d 279, 282 (4th Cir 1999); United States v Suber, 75 Fed Appx. 442 (6th Cir 2003).

For those reasons previously stated in these papers Larry O'Neil Walker respectfully requests that this Honorable Court terminate his

supervised release.

Respectfully submitted,

/s/Steven Scharg
STEVEN SCHARG P43732
Attorney for Defendant Walker
615 Griswold, Suite 1120
Detroit, Michigan 48226
(313) 300-0214
Scharg1924@gmail.com

Dated: February 16, 2021

CERTIFICATE OF SERVICE

I hereby certify that I served Assistant U.S. Attorney, Eaton Brown,
with a copy of this Motion by ECF filing on February 17, 2021.

Respectfully submitted,

/s/Steven Scharg
STEVEN SCHARG P43732
Attorney for Defendant Walker
615 Griswold, Suite 1120
Detroit, Michigan 48226
(313) 300-0214
Scharg1924@gmail.com